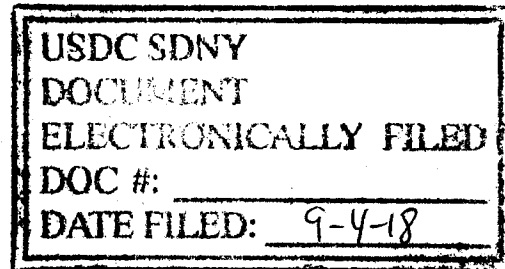


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



-----	X
	:
ARUN BHATTACHARYA, Individually and	:
on Behalf of All Others Similarly Situated,	: No. 1:18-cv-07677-JFK
	:
Plaintiff,	: CLASS ACTION
	:
vs.	:
	:
NIELSEN HOLDINGS PLC, DWIGHT	:
MITCHELL BARNES and JAMERE	: STIPULATED ORDER
JACKSON,	:
	:
Defendants.	:
-----	X

Subject to the approval of the Court, plaintiff Arun Bhattacharya ("Plaintiff") and defendants Nielsen Holdings plc, Dwight Mitchell Barnes, and Jamere Jackson (collectively, "Defendants"), through their undersigned attorneys, stipulate and agree as follows:

WHEREAS, on August 22, 2018, Plaintiff filed a Class Action Complaint alleging violations of federal securities laws captioned *Arun Bhattacharya, Individually and on Behalf of All Others Similarly Situated vs. Nielsen Holdings plc, Dwight Mitchell Barnes and Jamere Jackson*, Case No. 1:18-cv-07677-JFK;

WHEREAS, Defendants have either been served with process or their undersigned counsel, who are authorized to accept service, hereby accept service of the summons and complaint in the above-captioned action on their behalf, without prejudice and without waiver of any of Defendants' defenses, objections, or arguments in this matter or any other matter, except as to sufficiency of service of process;

WHEREAS, this putative class action asserts federal securities claims arising under the Securities Exchange Act of 1934, which is governed by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”). *See* 15 U.S.C. § 78u-4 *et seq.*;

WHEREAS, this putative class action is related to an earlier-filed putative class action also asserting claims under the Securities Exchange Act of 1934 and governed by the PSLRA, captioned *Craig Gordon, Individually and on Behalf of All Others Similarly Situated vs. Nielsen Holdings plc, Dwight Mitchell Barns and Jamere Jackson*, Case No. 1:18-cv-07143-JFK (the “*Gordon Action*”);

WHEREAS, the PSLRA provides for consolidation of all related actions and the appointment of a lead plaintiff and lead counsel, after a 60-day notice period expires following the publication of notice of the filing of the initial securities class action. *See* 15 U.S.C. § 78u-4(a)(3);

WHEREAS, notice of the filing of the *Gordon Action* was published on August 8, 2018;

WHEREAS, motions for the appointment as lead plaintiff and for approval of the lead plaintiff’s selection of lead counsel are not due in the *Gordon Action* and related matters until October 9, 2018;

WHEREAS, lead plaintiff and lead counsel will not be appointed until after the completion of briefing on any lead plaintiff motions, and accordingly it is unclear at this time who will ultimately have the authority to act on behalf of Plaintiff and the putative class, and whether the court-appointed lead plaintiff will file a consolidated or amended complaint, or stand on the existing complaint filed herein; and

WHEREAS, no party has previously requested or received time for an extension to answer or otherwise plead to the complaint in the above-captioned action;

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for Plaintiff and Defendants, that:

1. Following appointment by the Court, the lead plaintiff must file a consolidated or amended complaint, or give written notice to Defendants that the lead plaintiff has elected to stand on the original complaint, no later than sixty (60) days after entry of the Court's order appointing lead plaintiff and lead counsel.
2. The time for Defendants to move, answer, or otherwise respond to the complaint is extended until sixty (60) days after the consolidated or amended complaint is filed or the lead plaintiff gives notice to Defendants that it has elected to stand on the original complaint.
3. If Defendants elect to file motions to dismiss, the lead plaintiff shall file its opposition to those motions no later than sixty (60) days after they are filed.
4. Defendants shall file replies in further support of any motions to dismiss no later than thirty (30) days after the lead plaintiff files its opposition.

IT IS ON THIS 4<sup>th</sup> day of September 2018 so Ordered:

By: John F. Keenan  
The Honorable John F. Keenan

By: 

J. Alexander Hood II  
Jeremy A. Lieberman  
POMERANTZ LLP  
600 Third Avenue, 20th Floor  
New York, NY 10016  
Telephone: (212) 661-1100  
Facsimile: (212) 661-8665

Patrick V. Dahlstrom  
POMERANTZ LLP  
10 South La Salle Street, Suite 3505  
Chicago, IL 60603  
Telephone: (312) 377-1181  
Facsimile: (312) 377-1184

Peretz Bronstein  
BRONSTEIN, GEWIRTZ & GROSSMAN, LLC  
60 East 42nd Street, Suite 4600  
New York, NY 10165  
Telephone: (212) 697-6484  
Facsimile: (212) 697-7296

*Attorneys for Plaintiff Arun Bhattacharya*

By: 

Paul C. Curnin  
Craig S. Waldman  
SIMPSON THACHER & BARTLETT LLP  
425 Lexington Avenue  
New York, NY 10017-3954  
Telephone: (212) 455-2000  
Facsimile: (212) 455-2502

*Attorneys for Defendants Nielsen Holdings plc, Dwight Mitchell Barns, and Jamere Jackson*